

Requester

Name: The WRAP Team

Organization:

- ☐ Participant _____
- ☐ Program Operator
- ☒ Program Administrator

Title: N/A

Phone Number:

Email: wrap@westernpowerpool.org

Date of Request to Resource Adequacy Participant Committee (RAPC): 11/20/2025

Exigent Circumstance

Check one:

- ☐ A FERC-mandated amendment to the Tariff or the Business Practice Manuals
- ☐ An amendment to the Tariff or the Business Practice Manuals to address an immediate reliability impact
- ☒ An amendment to this Tariff or the Business Practice Manuals that the RAPC has determined has significant impacts to utility service

Date Exigent Circumstance determined by RAPC:

Type of Change Requested

Check one:

- ☐ Correction (*i.e., revising erroneous language or language that needs clean-up for grammatical errors or inconsistency across governing documents - no changes to intent or policy*)
- ☐ Clarification (*i.e., revising language to better represent existing intent, no changes to functionality or policy*)
- ☒ Enhancement (*i.e., revising language to expand upon existing intent or functionality*)
- ☐ New Protocol, Business Practice, Criteria, Tariff (*i.e., new language to accommodate new functionality or policy not existing today*)
- ☐ Change (*i.e., a change in the existing policy – will replace an existing language*)
- ☐ Other (*i.e., changes that do not fall into the categories listed above*)

Description of Change

Provide a description of the issue:

New language is needed in BPM 102, Section 4.1 (Subregions Used for Determination of Monthly FSPRMs) to:

- Reflect the updated Balancing Authority Area assignments due to a change in the WRAP footprint, incorporating Idaho Power into the Northwest Subregion and Tucson Electric Power into the Southwest and East Subregion for LOLE studies beginning with the Winter 2027–2028 Binding Season.
- Clarify that the Program Administrator may make exceptions during the transition period to ensure new Participants are properly included in the appropriate Subregion.

This clarification is necessary due to the withdrawal of six Participants that have provided notice to leave the WRAP as it transitions to binding operations, resulting in imbalanced Subregions with limited transmission connectivity in the Southwest and East Subregion. The update is required to enable SPP to begin accurate modeling for the upcoming Binding Season, while broader updates and refinements will continue as the program evolves. Note that this change does not preclude or prevent the eventual adoption of policies to further revise the subregions with outcomes from day ahead market integration efforts, but is nevertheless essential to endorse to enable the timely undertaking of LOLE and ELCC modeling for Winter 27/28 metrics.

Please provide the following information if known and/or available.

1. Provide a proposed solution to the issue described:
Introducing new language to BPM 102:

Section 4.1 Subregions Used for Determination of Monthly FSPRMs

Two Subregions have been identified in the WRAP Region: the Northwest Subregion and the Southwest and East Subregion. LOLE Study simulations are conducted separately for each of the Subregions. Each Subregion is comprised of load and generation from within certain Balancing Authority Areas, and the boundaries of each Subregion are defined by the boundaries of the combined area of the component Balancing Authority Areas. The component Balancing Authority Areas for each Subregion are as follows:

- Northwest Subregion (Zones 1, 2, 3, 4)
 - Avista Corporation

- BC Hydro and Power Authority^{Error! Bookmark not defined.}
- Bonneville Power Authority
- Chelan County PUD #1
- Douglas County PUD #1
- Grant County PUD #2
- Northwestern Energy
- PacifiCorp West
- Portland General Electric
- Puget Sound Energy
- Seattle City and Light
- Tacoma Power

- Southwest and East Subregion (Zones 6, 7, 8, 11)

- Arizona Public Service
- Basin Electric
- Black Hills
- Idaho Power Company
- NV Energy
- PacifiCorp East
- Public Service Company of New Mexico
- Salt River Project

Beginning with the Winter 2027–2028 Binding Season, the LOLE Study to determine the FSPRM values will reflect the following, updated Balancing Authority Areas for the Northwest Subregion and Southwest and East Subregion, respectively:

- Northwest Subregion (Zones 1, 2, 3, 4, 5)

- Avista Corporation
- BC Hydro and Power Authority
- Bonneville Power Authority
- Chelan County PUD #1
- Douglas County PUD #1
- Grant County PUD #2
- Idaho Power Company
- Northwestern Energy
- PacifiCorp West
- Portland General Electric
- Puget Sound Energy

- Seattle City and Light
- Tacoma Power
- Southwest and East Subregion (Zones 6, 7, 8, 11)
 - Arizona Public Service
 - Basin Electric
 - Black Hills
 - NV Energy
 - PacifiCorp East
 - Public Service Company of New Mexico
 - Salt River Project
 - Tucson Electric Power

Any load for which a Participant is responsible (that has not been excluded – see *BPM 103 Forward Showing Capacity Requirement*) that does not reside within one of the Balancing Authority Areas listed above will be added to one of the Subregions. ~~A new Participant will be assigned by WPP to an appropriate Subregion (and thus modify the boundary thereof) subject to objection of the RAPC to such assignment, expressed by action of the RAPC.~~

In the event a significant change to the transmission system is identified (e.g. new transmission capacity, changes in transmission rights ownership), the boundaries of the Subregions above may be reconsidered. A Participant may:

1. Request the Program Administrator conduct analysis of the potential impact of the change to the Subregion. The Program Administrator will take input from the requesting Participant and will determine the appropriate form and focus of such analysis. As possible, this analysis will be made public, in accordance with confidentiality guidelines set out in the Tariff.
2. File a Change Request Form (see *BPM 301 Program Review Committee Workplan Development and Approval*) requesting the Balancing Authority Area within which some portion of its load (for which it is the LRE) be reassigned to another Subregion.
 - a. Following submission of the Change Request Form, other Participants with loads within the identified Balancing Authority Area will be given 30 days to provide comment. Any comments received will be added to the Change Request Form as appendices.

- b. Following the comment period in step 2a, the Change Request Form will be treated as a Non-Task Force Proposal (see *BPM 301*).
- c. Such Change Request Forms must be submitted at least 9 months prior to the deadline for the Advance Assessment Data Request for the Binding Season such change is requested (see *BPM 101 Advance Assessment*). For example, if a change to Subregion boundaries is requested for Summer 2032, the Advance Assessment Data Request for Summer 2032 is due March 1, 2030, so such a request would need to be submitted by June 1, 2029.

A new Participant will be assigned by WPP to an appropriate Subregion (and thus modify the boundary thereof) subject to objection of the RAPC to such assignment, expressed by action of the RAPC. During the Transition Period, the Program Administrator may include in the Advance Assessment new participants committed to binding participation in the season being studied.

1. Provide the specific document and language you would like changed:
[See Above]
2. Provide a suggestion for how language could be updated to address issue:
[See Above]

Impact of Change

Please provide the following information if known and/or available.

1. Any data/information available that would characterize the importance or magnitude of the issue (allows for file attachments):
[See Description of The Issue Above]
2. Describe the benefits that will be realized from this change:
Allow for SPP to begin accurate modeling for the upcoming Binding Season.